

# EXHIBIT B

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**From:** Erica Sibley Bahnsen <ESibley@ebglaw.com>  
**Sent:** Wednesday, September 23, 2020 5:38 PM  
**To:** Nick Shodrok; Eric Findlay; Christopher M. Farella; George B. Breen; Brian Craft  
**Cc:** Trey Duck; Cody Hill  
**Subject:** RE: Team Health; Case No. 2:16-cv-432-JRG

Nick—

Defendants are willing to waive the confidentiality designation on the following documents:

TH-EDTX-00000383-89  
TH-EDTX-00001968-70  
TH-EDTX-00042828  
TH-EDTX-00042829  
TH-EDTX-00058942, TH-EDTX-00059139-56

We are willing to meet and confer to discuss the other documents and deposition transcripts you reference below; however, we are not willing to waive confidentiality on those documents at this time.

Erica



**Erica Sibley Bahnsen** | [Bio](#)  
t 202.861.1867 | f 202.861.3079  
[ESibley@ebglaw.com](mailto:ESibley@ebglaw.com)

1227 25th Street NW | Washington, DC 20037  
t 202.861.0900 | [www.ebglaw.com](http://www.ebglaw.com)

*Think Green. Please consider the environment before you print this message. Thank you.*

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**From:** Nick Shodrok  
**Sent:** Thursday, September 17, 2020 4:44 PM  
**To:** Eric Findlay ; Christopher M. Farella ; George B. Breen ; Erica Sibley Bahnsen ; Brian Craft  
**Cc:** Trey Duck ; Cody Hill  
**Subject:** Re: Team Health; Case No. 2:16-cv-432-JRG

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\*\*\* EXTERNAL EMAIL \*\*\*

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Counsel,

Pursuant to the Court's Protective Order (Dkt. No. 69), Relators hereby challenge Defendants' "Confidential" designations of the documents and transcripts identified below (in their entirety). Defendants inappropriately designated these as "Confidential," as such documents and transcript excerpts do not contain confidential proprietary and business information and/or trade secrets and are otherwise not "Confidential."

- TH-EDTX-00076543-44
- TH-EDTX-00237470-76
- TH-EDTX-00032236-37
- TH-EDTX-00277199-201
- TH-EDTX-00058942, TH-EDTX-00059139-56
- TH-EDTX-00078689-711
- TH-EDTX-00228614-44
- TH-EDTX-00058603-04
- TH-EDTX-00086281-372
- TH-EDTX-00089554-80
- TH-EDTX-00075911-20
- TH-EDTX-00000569-71
- TH-EDTX-00044141-333
- TH-EDTX-00270235
- TH-EDTX-00087428-29
- TH-EDTX-00077752-54
- TH-EDTX-00269444-61
- TH-EDTX-00087599-604
- TH-EDTX-00236432-34
- TH-EDTX-00032240-44
- TH-EDTX-00077760-63
- TH-EDTX-00052110-15
- TH-EDTX-00085922-68
- TH-EDTX-00043162-67
- TH-EDTX-00236432-34
- TH-EDTX-00087471-72
- TH-EDTX-00078474-75
- TH-EDTX-00088992-96
- TH-EDTX-00005453
- TH-EDTX-00040861-63
- TH-EDTX-00000569-71
- TH-EDTX-00000383-89
- TH-EDTX-00005462-64
- TH-EDTX-0040828-31
- TH-EDTX-00001204-05
- TH-EDTX-00042829
- TH-EDTX-00042661-65
- TH-EDTX-00042828
- TH-EDTX-00001968-70
- Transcript of September 3, 2020 deposition of Hamilton Lempert, M.D.
- Transcript of July 10, 2020 Deposition of John Turner, M.D.
- Transcript of September 9, 2020 Deposition of Sandra Steele.
- Transcript of July 22, 2020 Deposition of John Turner, M.D.
- Transcript of August 31, 2020 Deposition of Elisa Dannemiller, M.D.
- Transcript of June 24, 2020 Deposition of Christa Cortez
- Transcript of July 31, 2020 Deposition of Jessica Parks
- Transcript of August 13, Deposition of Elisa Parra

- Transcript of September 2, 2020 Deposition of John Stair
- Transcript of September 14, 2020 Deposition of Kim Diep Do
- Transcript of September 11, 2020 Deposition of Robert Franz, M.D.
- Transcript of September 17, 2020 Deposition of Linda Thacker

Please advise whether Defendants agree to waive the confidential treatment afforded to these materials **by 7:00 pm CST on Monday, September 21**. If Relators receive no response from Defendants by then, Relators will assume that Defendants do not agree with Relators' position that these materials are not "Confidential" under the Protective Order.

Relators fully reserve their rights under the Protective Order to challenge additional documents or deposition transcripts designated by Defendants as "Confidential."

Thanks,  
Nick Shodrok



3600 North Capital of Texas Hwy.  
Building B, Suite 350  
Austin, Texas 78746  
**Ph. (512) 328-5333**  
**Fax (512) 328-5335**  
[nshodrok@nixlaw.com](mailto:nshodrok@nixlaw.com)

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